

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

LAWRENCE (LARRY) W. SINCLAIR)	
Plaintiff, Pro Se)	
)	Case No. 5:23-CV-109
VS)	
)	
BRIAN MARK KRASSENSTEIN, et al)	
<u>Defendants.</u>)	

**PLAINTIFFS EMERGENCY MOTION FOR RESTRAINING ORDER ON
DEFENDANTS EDWARD LAWRENCE KRASSENSTEIN AND BRIAN MARK
KRASSENSTEIN**

COMES NOW PLAINTIFF, Lawrence (Larry) W. Sinclair WITH EMERGENCY MOTION FOR RESTRAINING ORDER AGAINST BOTH INDIVIDUAL DEFENDANTS EDWARD LAWRENCE KRASSENSTEIN AND BRIAN MARK KRASSENSTEIN as state grounds therefore as follows:

Plaintiff just within the hour filed Plaintiffs Response in Opposition to Defendants Motion to Dismiss pursuant to Rule 12 (b) 1 Fed RCP and Alternative Motion to Transfer Venue. At the same time of filing plaintiff received a phone call from plaintiffs friend and owner of Champion Fine Meats Erik Gamez, who provided a sworn affidavit included in Plaintiffs response stating a guy saying his name was Eddie kept calling his business from phone number 609-703-8024 which has been determined to belong to and/or

associate with Defendant Edward Lawrence Krassenstein. Mr. Gamez advised plaintiff “Eddie” continued to demand he answer Eddies questions as to where is Larry Sinclair, where does he live, he cannot live there that’s a business repeatedly. Mr. Gamez refused to answer defendants questions at which time Mr. Gamez advised plaintiff Defendant threatened Mr. Gamez stating “you will answer my questions when I call the police.

Plaintiff seeks an EMERGENCY RESTRAINING ORDER against named defendants barring defendants from contacting in any manner any witness and individual identified as associated with, friends of Plaintiff or who have provided affidavits or any other statements on behalf of plaintiff in this case. In addition ORDER defendants to cease posting on any social media or internet platforms or websites claims this court has determined them to be exonerate or any posts mentioning plaintiff or plaintiffs address or anything associated with individuals assisting plaintiff in any way. Plaintiff seeks this Courts ORDER directing Defendants Counsel to immediately file notice of appearance in this matter, and to direct his clients to refrain from harassment, threatening, or contacting anyone associated with plaintiff.

Wherefore Plaintiff respectfully and urgently ask this Honorable Court to immediate issue the requested restraining order.

Submitted this 31st day of January 2024

Respectfully Submitted,
Lawrence Sinclair
Lawrence (Larry) W. Sinclair
Plaintiff, Pro Se

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CERTIFICATE OF SERVICE

I Lawrence (Larry) W. Sinclair HEREBY certify that a true and correct copy of the foregoing **PLAINTIFFS EMERGENCY MOTION FOR RESTRAINING ORDER** has been furnished electronically by email (because Counsel for Defendants has not yet entered his appearance in the courts electronic filing system permitting e service) Charles A. Bennett cbennett@bennettlegal.com Counsel for Defendants this 31st day of January 2024.

Lawrence Sinclair

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